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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	Chapter 11
	:
LEHMAN BROTHERS HOLDINGS, INC., <u>et al.</u> ,	Case No. 08-13555(JMP)
	:
Debtors.	:
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**RESPONSE OF LYDIAN OVERSEAS PARTNERS MASTER FUND LTD TO
DEBTORS' FOURTH OMNIBUS OBJECTION TO CLAIMS
(AMENDED AND SUPERSEDED CLAIMS)**

Lydian Overseas Partners Master Fund Ltd. ("Lydian") hereby responds to the Debtors' Fourth Omnibus Objection to Claims (the "Objection") filed by the above-captioned debtors and debtors-in-possession (the "Debtors") and respectfully represents as follows:

1. On September 16, 2009, Lydian filed claim number 13212 which is listed in the Objection and which the Debtors seek to expunge in favor of claim number 37405 – the “surviving claim” as identified in the Objection. The claims are based upon a derivative contract and a guaranty, and Lydian has timely completed, as required by this Court’s bar date order, the applicable online questionnaires on the website established by the Debtors for that purpose.

2. While Lydian does not object in principle to the relief requested in the Objection (i.e., elimination of the claim that has been superseded), Lydian wants to ensure that granting the relief requested in the Objection will not result in the expungement or erasure of, and consequent inability of Lydian to refer, rely upon or otherwise use, the uploaded information provided pursuant to the derivative and guarantee questionnaires. The information and documents uploaded electronically are an integral part of the surviving claim and must be preserved should the Debtors later make a substantive objection to the surviving claim. In essence, granting the relief requested in the Objection should result only in the expungement of the earlier paper proof of claim and not the supporting documentation provided on the website. Whether that can be accomplished by means of simply associating the surviving claim number with the entirety of the electronically uploaded information and documentation or by some other means is a matter of indifference to Lydian so long as the information is preserved and deemed part of Lydian's surviving claim.

Dated: New York, New York
March 1, 2010

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*Attorneys for Lydian Overseas Partners Master
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